

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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 UNITED STATES OF AMERICA : CONSENT PRELIMINARY ORDER  
 - v. - : OF FORFEITURE/  
 : MONEY JUDGMENT  
 TREVOR TAYLOR, : 22 Cr. 149 (DLC)  
 :  
 Defendant. :  
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WHEREAS, on or about March 8, 2022, TREVOR TAYLOR (the “Defendant”), was charged in an Information, 22 Cr. 149 (DLC) (the “Information”), with conspiracy to commit securities fraud, investment adviser fraud, and wire fraud, in violation of Title 18, United States Code, Section 371 (Count One); securities fraud, in violation of Title 15, United States Code, Sections 78j(b) and 78ff; Title 17, Code of Federal Regulations, Section 240.10b-5, and Title 18, United States Code, Section 2 (Count Two); and investment adviser fraud, in violation of Title 15, United States Code, Sections 80b-6(4) and 80b-17, Title 17, Code of Federal Regulations, Section 275.206(4)-8, and Title 18, United States Code, Section 2 (Count Three);

WHEREAS, the Information included a forfeiture allegation as to Counts One through Three of the Information, seeking forfeiture to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461, of all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of the offenses charged in Counts One through Three of the Information, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of the offenses charged in Counts One through Three of the Information that the Defendant personally obtained;

WHEREAS, on or about May 17, 2022, the Defendant pled guilty to Counts One through Three of the Information;

WHEREAS, in satisfaction of his forfeiture obligation, the Defendant agrees to forfeit to the Government his interest in any unpaid deferred compensation and any funds invested with Allianz Global Investors, including any restitution claim for lost invested funds, in the total amount of \$13,460,708.21, representing proceeds traceable to the offenses charged in Counts One and Two of the Information that the Defendant personally obtained; and

WHEREAS, the Defendant admits that, as a result of acts and/or omissions of the Defendant, the proceeds traceable to the offenses charged in Counts One and Two of the Information that the Defendant personally obtained cannot be located upon the exercise of due diligence.

IT IS HEREBY STIPULATED AND AGREED, by and between the United States of America, by its attorney Matthew Podolsky, Acting United States Attorney, Assistant United States Attorney Sarah Mortazavi, of counsel, and the Defendant and his counsel, Jonathan R. Streeter, Esq., that:

1. As a result of the offenses charged in Counts One through Three of the Information, to which the Defendant pled guilty, a money judgment reflecting the defendant's forfeiture to the Government of his interest in any unpaid deferred compensation and any funds invested with Allianz Global Investors, including any restitution claim for lost invested funds, in the total amount of \$13,460,708.21, representing proceeds traceable to the offenses charged in Counts One through Three of the Information that the Defendant personally obtained (the "Money Judgment"), shall be entered against the Defendant.

2. Pursuant to Rule 32.2(b)(4) of the Federal Rules of Criminal Procedure, this Consent Preliminary Order of Forfeiture/Money Judgment is final as to the Defendant TREVOR TAYLOR, and shall be deemed part of the sentence of the Defendant, and shall be included in the judgment of conviction therewith.

3. All payments on the outstanding money judgment shall be made by postal money order, bank or certified check, made payable, in this instance, to the United States Marshals Service, and delivered by mail to the United States Attorney's Office, Southern District of New York, Attn: Illicit Finance and Money Laundering Unit, 26 Federal Plaza, 38<sup>th</sup> Floor, New York, New York 10278 and shall indicate the Defendant's name and case number.

4. The United States Marshals Service is authorized to deposit the payments on the Money Judgment into the Assets Forfeiture Fund, and the United States shall have clear title to such forfeited property.

5. Pursuant to Title 21, United States Code, Section 853(p), the United States is authorized to seek forfeiture of substitute assets of the Defendant up to the uncollected amount of the Money Judgment.

6. Pursuant to Rule 32.2(b)(3) of the Federal Rules of Criminal Procedure, the United States Attorney's Office is authorized to conduct any discovery needed to identify, locate or dispose of forfeitable property, including depositions, interrogatories, requests for production of documents and the issuance of subpoenas.

7. The Court shall retain jurisdiction to enforce this Consent Preliminary Order of Forfeiture/Money Judgment, and to amend it as necessary, pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure.

8. The signature page of this Consent Preliminary Order of Forfeiture/Money Judgment may be executed in one or more counterparts, each of which will be deemed an original but all of which together will constitute one and the same instrument.

AGREED AND CONSENTED TO:

MATTHEW PODOLSKY  
Acting United States Attorney for the  
Southern District of New York

By:

  
SARAH MORTAZAVI  
Assistant United States Attorney  
26 Federal Plaza  
New York, NY 10278  
(212) 637-2520

2/20/2025

DATE

TREVOR TAYLOR

By:

  
TREVOR TAYLOR

2/20/25

DATE

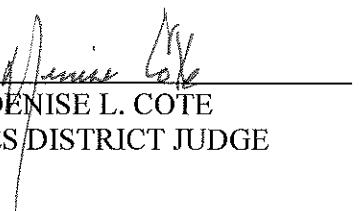
By:

  
JONATHAN R. STREETER, ESQ.  
Attorney for Defendant  
1095 Avenue of the Americas  
New York, NY 10036

2/20/25

DATE

SO ORDERED:

  
HONORABLE DENISE L. COTE  
UNITED STATES DISTRICT JUDGE

  
DATE